

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LAURI VALJAKKA,

Plaintiff,

vs.

NETFLIX, INC.,

Defendant.

§
§
§
§
§
§
§
§
§

No. 6:21-cv-00947-ADA

**JOINT MOTION TO TRANSFER TO THE NORTHERN DISTRICT OF CALIFORNIA
AND TO VACATE ALL PENDING DEADLINES**

Plaintiff Lauri Valjakka (“Valjakka”) and Defendant Netflix, Inc. (“Netflix”) (collectively the “Parties”) have met and conferred regarding the Motion to Dismiss for Improper Venue, or in the Alternative, Transfer to the Northern District of California (Dkt. 13) that Netflix filed in response to Valjakka’s original Complaint. Although that motion was mooted when Valjakka filed its Amended Complaint (Dkt. 14), the parties met and conferred regarding Netflix’s intent to renew its Motion to Dismiss or Transfer in response to the Amended Complaint, which included the same venue allegations as the original Complaint. In light of Netflix’s original and to-be-renewed Motion to Dismiss, Valjakka agrees with Netflix to transfer the above captioned case to the Northern District of California.

The Parties thus jointly move this Court for an Order to (1) vacate any deadlines under this Court’s Standing Orders, federal rules, and/or local rules of this Court, and (2) transfer this case to the Northern District of California.

Dated: March 3, 2022

Respectfully submitted,

Ramey & Schwaller, LLP

/s/ William P. Ramey, III
William P. Ramey, III
Texas Bar No. 240274643
Houston, Texas 77006
(713) 426-3923 (telephone)
(832) 900-4941 (fax)
wramey@rameyfirm.com

Attorneys for Plaintiff Lauri Valjakka

Perkins Coie LLP

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier (admitted)
505 Howard Street
San Francisco, CA 94104
SPiepmeier@perkinscoie.com
Telephone: (415) 344-7000
Facsimile: (415) 344-7050

Janice Ta (24075138)
500 W. 2nd St. 1900
Austin, TX 78701
jta@perkinscoie.com
Telephone: (737)256-6125

Attorneys for Defendant Netflix, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed on this 3rd day of March, 2022, pursuant to the CM/ECF system of the United States District Court for the Western District of Texas, which provides for service on counsel of record in accordance with the electronic filing protocols in place.

Dated: March 3, 2022

/s/ Sarah E. Piepmeier

Sarah Piepmeier

CERTIFICATE OF CONFERENCE

I hereby certify that on February 21, 2022, counsel for Defendant Netflix Inc. conferred by telephone with counsel for Plaintiff Lauri Valjakka on this Motion. Plaintiff responded by email on March 2, 2022 and stated that they are unopposed to this Motion.

Dated: March 3, 2022

/s/ Sarah E. Piepmeier

Sarah Piepmeier

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LAURI VALJAKKA,

Plaintiff,

vs.

NETFLIX, INC.,

Defendant.

§
§
§
§
§
§
§
§
§

No. 6:21-cv-00947-ADA

ORDER OF THE COURT

Before the Court is the parties' Joint Motion to Transfer to the Northern District of California and to Vacate All Pending Deadlines. The Court, having considered the same, is of the opinion the Joint Motion should be GRANTED.

IT IS THEREFORE ORDERED THAT:

1. All deadlines in the above-captioned case are vacated, including deadlines under this Court's Standing Orders, federal rules, and/or local rules of this Court, including without limitation relating to all pending motions.
2. The above-captioned case is transferred to the United States District Court for the Northern District of California.

DATED: March ____, 2022

Judge of the United States District Court